

DOCKET NO. 2020-2-E

PETITION TO INTERVENE

2. S.C. Code Ann. Section 58-27-865 provides the procedure for review and recovery of fuel costs and of “incremental and avoided costs of distributed energy resource programs and net metering as authorized and approved under Chapters 39 and 40, Title 58[, which] shall be allocated and recovered from customers under a separate distributed energy component of the overall fuel factor that shall be allocated and

recovered based on the same method that is used by the utility to allocate and recover variable environmental costs.”

3. S.C. Code Section 58-39-140 of the South Carolina Distributed Energy Resource Act and Commission Order 2015-194 allow the Company to recover certain reasonable and prudent costs incurred to implement approved distributed energy resource (“DER”) programs, including certain costs related to net energy metering (“NEM”). Recoverable costs are capped in Section 58-39-150 “[f]or the protection of consumers and to ensure that the cost of DER programs do not exceed a reasonable threshold.”

4. Pursuant to the South Carolina Distributed Energy Resource Act, the Energy Freedom Act, and the Settlement Agreement approved by the Commission in Order No. 2015-194, Docket No. 2014-246-E, DESC will also compute and update annually the “costs and benefits of net metering and the required amount of the DER NEM Incentive” coincident in time with the Utility’s filing under the fuel clause. Under the Energy Freedom Act and Order No. 2015-194, the DER NEM incentive will apply to customer-generators who apply for net metering prior to June 1, 2021, and will be available to these customers until May 31, 2029.

5. This Petition to Intervene is timely filed, as the Commission has established an intervention deadline of December 5, 2019 for this proceeding.

6. The South Carolina Coastal Conservation League (“CCL”) is a nonprofit organization whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in their communities by working with individuals, businesses and government to ensure balanced solutions. CCL supports the development of energy policy that is in the public interest of South Carolinians. CCL has

members from across the State, including members who receive electricity service from DESC and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of DER programs and net metering. The address of CCL's main office is 328 East Bay Street, Charleston, SC 29402.

7. Southern Alliance for Clean Energy ("SACE") is a nonprofit organization whose mission is to promote responsible energy choices that create global warming solutions and ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South's energy needs. Like CCL, SACE has members from across the state, including members who receive electricity service from DESC and will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of DER programs and net metering. The principal address of SACE is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Florida, Georgia, North Carolina, and South Carolina.

8. The Conservation Groups and their members have direct and substantial interests that will be impacted by the decisions made in this proceeding regarding renewable energy and the recovery of fuel costs and incremental and avoided costs of DER programs and net metering, and their interests cannot be adequately addressed by any other party. The Conservation Groups seek to ensure a full and proper valuation of NEM generation and appropriate cost recovery consistent with the Settlement Agreement approved in Docket 2014-246-E that will accurately reflect and support an effective and diversified portfolio of distributed energy resources and lead to cleaner, safer, and

healthier communities for all South Carolinians. The Conservation Groups also seek to ensure that the Company's fuel purchasing practices and policies result in the lowest reasonable costs to customers, and that the Company's fuel costs are just and reasonable. The Conservation Groups' support for these policies and involvement in this proceeding will promote their members' interests as well as the broader public interest. Petitioning to intervene in this proceeding is also consistent with the Commission's policies encouraging maximum public participation in the issues before it.

9. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Conservation Groups are represented by counsel in this proceeding:

William C. Cleveland, IV
 Southern Environmental Law Center
 463 King St., Suite B
 Charleston, SC 29403
 Telephone: (843) 720-5270
 Fax: (843) 720-5240
 Email: wcleveland@selcva.org

WHEREFORE, the Conservation Groups pray that they be allowed to intervene as parties of record and to participate fully in this proceeding.

Respectfully submitted this 5th day of December, 2019.

s/ William C. Cleveland, IV
 SC Bar No. 79051
 Southern Environmental Law Center
 463 King St., Suite B
 Charleston, SC 29403
 Telephone: (843) 720-5270
 Fax: (843) 720-5240

*Attorney for South Carolina
 Coastal Conservation League and
 Southern Alliance for Clean Energy*

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2020-2-E

In re: Annual Review of Base Rates)
for Fuel Costs of Dominion Energy)
South Carolina, Incorporated)
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)
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)

CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via electronic mail or first class U.S. Mail with a copy of the *Petition to Intervene* of the South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

Alexander G. Shissias, Counsel
The Shissias Law Firm, LLC
1727 Hampton Street
Columbia, SC 29201
Email: alex@shissiaslawfirm.com

Becky Dover, Counsel
SC Department of Consumer Affairs
Email: bdover@scconsumer.gov

Carri Grube Lybarker, Counsel
SC Department of Consumer Affairs
Email: clybarker@scconsumer.gov

Damon E. Xenopoulos, Counsel
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, N.W.
Eighth Floor, West Tower
Washington, DC 20007
Email: DEX@smxblaw.com

Jeffrey M. Nelson, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
Email: jnelson@ors.sc.gov

Jenny R. Pittman, Counsel
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
Email: jpittman@ors.sc.gov

K. Chad Burgess, Director & Deputy
General Counsel
Dominion Energy South Carolina, Inc.
220 Operation Way - MC C222
Cayce, SC 29033-3701
Email:
Kenneth.burgess@dominionenergy.com

Matthew W. Gissendanner, Senior
Counsel
Dominion Energy South Carolina, Inc.
220 Operation Way - MC C222
Cayce, SC 29033-3701
Email:
matthew.gissendanner@dominionenergy.com

Richard L. Whitt*, Counsel
Whitt Law Firm, LLC
Email: Richard@rlwhitt.law

Scott Elliott, Counsel
Elliott & Elliott, PA
1508 Lady Street
Columbia, SC 29201
Email: selliot@elliottlaw.us

This 5th day of December, 2019.

s/ William C. Cleveland, IV
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